

From: Marshall L. Miller <mmiller@kaplanhecker.com>
Sent: Saturday, February 6, 2021 9:22 PM
To: marc.weinstein@hugheshubbard.com; neil.oxford@hugheshubbard.com
Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>
Subject: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

Great. How about Thursday or Friday at some point from 330 on?

Marshall L. Miller | Kaplan Hecker & Fink LLP

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mmiller@kaplanhecker.com

From: Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>
Sent: Saturday, February 6, 2021 7:28 PM
To: Marshall L. Miller <mmiller@kaplanhecker.com>; Oxford, Neil <neil.oxford@hugheshubbard.com>
Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>
Subject: RE: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

EXTERNAL SENDER

Marshall, let's set up a time to chat in the latter half of next week.

Marc A. Weinstein | Partner

Chair, White Collar Defense

Hughes Hubbard & Reed LLP

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From: Marshall L. Miller <mmiller@kaplanhecker.com>
Sent: Sunday, January 31, 2021 10:18 PM
To: Oxford, Neil <neil.oxford@hugheshubbard.com>; Weinstein, Marc A.



<marc.weinstein@hugheshubbard.com>

Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>

Subject: RE: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

CAUTION: This email was sent by someone outside of the Firm.

Marc/Neil:

Checking in to see if you've been able to make any progress on the request detailed below.

Best regards,

Marshall

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mmiller@kaplanhecker.com

From: Marshall L. Miller

Sent: Monday, January 18, 2021 10:07 PM

To: Oxford, Neil <neil.oxford@hugheshubbard.com>; Weinstein, Marc A.

<marc.weinstein@hugheshubbard.com>

Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>

Subject: RE: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

Marc & Neil:

Thanks again for your time on the phone today.

Further to our discussion about a communication from SKAT updating SØIK on the efforts our clients have made to satisfy their obligations since the Settlement Agreement was entered, we wanted to propose the following language for your consideration:

“Since entering the May 28, 2019 Settlement Agreement, the Covered Parties’ Designees—Matthew Stein, Jerome Lhote, and Luke McGee—have complied with their obligations under the agreement and provided substantial cooperation to SKAT in support of SKAT’s actions to recover funds obtained by other parties involved in dividend reclaim applications. At the Covered Parties’ Designees’ direction, their lawyers have:

- Reviewed and produced tens of thousands of documents in SKAT’s pending suits against non-settling parties in the United States;
- Reviewed and approved SKAT’s requests to use the Covered Parties’ Designees’ documents in SKAT’s litigation against other parties in Dubai and the United Kingdom;
- Performed research and made proffers to SKAT’s U.S. lawyers over the past 18 months to address factual questions SKAT raised in connection with its prosecution of claims against other parties; and
- Addressed other substantive and procedural questions and requests from SKAT’s lawyers to help facilitate SKAT’s prosecution of its civil actions across multiple jurisdictions.

In addition to these cooperation efforts, to date the Covered Parties have, through the Covered Parties’ Designees, paid SKAT 985,307,682 DKK in installments on their obligation to repay SKAT the full amount of the net proceeds that the Covered Parties received directly or indirectly from reclaim applications. To facilitate expeditious repayment to SKAT, the Covered Parties’ Designees are engaged in significant, ongoing efforts to sell certain illiquid assets. Those asset liquidation efforts have been documented and explained in regular updates provided to SKAT’s counsel.

Once the Covered Parties pay the remainder of the settlement amount, as well as any additional “true-up” amount that SKAT determines is necessary to ensure full repayment of the net proceeds received from reclaim applications, the Covered Parties will have satisfied their obligations under the Settlement Agreement and fully resolved SKAT’s claims relating to them.”

This provides an idea of the type of communication we hoping SKAT will consider making. Let us know if we can address any questions or comments; happy to hop on the phone again if it would be easier to discuss on a short call.

Thanks,

Marshall

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From: Oxford, Neil <neil.oxford@hugheshubbard.com>

Sent: Thursday, January 14, 2021 10:45 PM
To: Marshall L. Miller <mmiller@kaplanhecker.com>
Cc: Christopher R. Le Coney <cconeyp@kaplanhecker.com>; Cahan, Valerie <valerie.cahan@hugheshubbard.com>; Weinstein, Marc A. <marc.weinstein@hugheshubbard.com>
Subject: Re: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

EXTERNAL SENDER

How about 4pm Monday?

Neil Oxford | Partner

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On Jan 14, 2021, at 9:33 PM, Marshall L. Miller <mmiller@kaplanhecker.com> wrote:

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Checking in again. Please let us know about availability.

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mmiller@kaplanhecker.com

From: Marshall L. Miller
Sent: Tuesday, January 12, 2021 12:11 PM
To: Oxford, Neil <neil.oxford@hugheshubbard.com>
Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>; Cahan, Valerie <valerie.cahan@hugheshubbard.com>
Subject: RE: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

Neil:
Following up on our request below and checking in about other outstanding issues, would you be free for a call sometime this week?
Best regards,

Marshall

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From: Oxford, Neil <neil.oxford@hugheshubbard.com>
Sent: Monday, December 14, 2020 7:56 AM
To: Marshall L. Miller <mmiller@kaplanhecker.com>
Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>; Cahan, Valerie <valerie.cahan@hugheshubbard.com>
Subject: Re: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

EXTERNAL SENDER

That works. Thanks

Neil Oxford | Partner

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On Dec 14, 2020, at 7:43 AM, Marshall L. Miller <mmiller@kaplanhecker.com> wrote:

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I have a call with DOJ at 3 that I can't move. How about 400?

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From: Oxford, Neil <neil.oxford@hugheshubbard.com>
Sent: Monday, December 14, 2020 7:17 AM
To: Marshall L. Miller <mmiller@kaplanhecker.com>
Cc: Christopher R. Le Coney <cleconey@kaplanhecker.com>; Cahan, Valerie <valerie.cahan@hugheshubbard.com>
Subject: Re: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

EXTERNAL SENDER

Thanks Marshall. Returned safe and sound. Could we chat briefly at say 3 today?

Best,

Neil

Neil Oxford | Partner

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On Dec 13, 2020, at 5:53 PM, Marshall L. Miller <mmiller@kaplanhecker.com> wrote:

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Neil,

I hope your trip to Copenhagen was safe and productive. Separate from the email Chris just sent regarding confidentiality issues in the UK, we also wanted to follow up regarding our request below. If you can update us when you have a chance on what your team has learned about the level of information SKAT provided to SOIK regarding our clients' payments and their cooperation with SKAT, we'd be most appreciative. Let us know if it would be helpful to set up a call to discuss.

Thanks,

Marshall

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mmiller@kaplanhecker.com

From: Oxford, Neil <neil.oxford@hugheshubbard.com>
Sent: Tuesday, December 1, 2020 12:31 PM
To: Christopher R. Le Coney <cleconey@kaplanhecker.com>
Cc: Marshall L. Miller <mmiller@kaplanhecker.com>
Subject: Re: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

Thanks Chris. We are working on your request and hope to have an update shortly.

Are you guys available for a quick call re confidentiality tomorrow, say 11am or noon?

Best,

Neil

Neil Oxford | Partner

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On Nov 30, 2020, at 10:43 PM, Christopher R. Le Coney <cleconey@kaplanhecker.com> wrote:

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Neil,

The production is generally comprised of two categories of emails dating to 2013 and 2014: (i) emails with Solo Capital Partners documenting trade approvals; and (ii) emails concerning liquidity requests for specific transactions.

To follow up on our last call, we also wanted to check in to see what your team has learned about the level of information SKAT has provided to SOIK regarding our clients' payments to Denmark and their cooperation with SKAT following the Settlement Agreement.

Thanks,

Chris

Christopher R. Le Coney | Kaplan Hecker & Fink LLP

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cleconey@kaplanhecker.com

From: Oxford, Neil <neil.oxford@hugheshubbard.com>
Sent: Monday, November 30, 2020 3:28 PM
To: Christopher R. Le Coney <cleconey@kaplanhecker.com>
Subject: Re: Maple Point LLC Production -- Confidential -- Case No. 18-md-2865 (S.D.N.Y.)

Thanks Chris. Can you tell us generally what is in this production?

Best,

Neil

Neil Oxford | Partner

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On Nov 30, 2020, at 7:26 PM, Christopher R. Le Coney <cleconey@kaplanhecker.com> wrote:

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CONFIDENTIAL

Counsel:

Attached please find correspondence concerning a production made in response to SKAT's June 25, 2019 subpoena to Maple Point LLC in case number 18-md-2865 (S.D.N.Y.). The link to download the production zip file is:
<https://kaplanhecker.box.com/s/jc1ubuvld40x84y86ffpq52ipclqyubc>.

The passwords for the link and the production zip file will be transmitted separately. Should you encounter any difficulty accessing the materials, please let us know.

Regards,

Chris

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<2020.11.30 - M. Miller to HHR re MDL Production (MPSKAT00212283-00214568).pdf>

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